

REMEDATION PRIORITIES

In parks with a large number of AML sites, procedures must be developed to select the remediation sequence. Remediation funds will always be limited, and generally the worst sites should be fixed first to get the most benefit. High priority sites have the following characteristics:

- * Extreme health and safety hazards.
- * Ease of access.
- * High visitation.
- * Difficult rescues.
- * Severe and progressive environmental degradation.

The field guide, Tab VII, includes an AML rating system with two scores, one score for health and safety hazards and a second score for resource impacts. This system gives equal ratings for hazards and resource impacts. The range in scores is one to three. Parks are free, of course, to develop their own rating system that more closely matches local conditions. Experts in developing rating methods have found that the ratings should not be too complicated, and there should not be more than three to six levels. Further, the score criteria should be written to limit the sites qualifying for the worst score with progressively more sites qualifying for a particular rating as the score criteria improve.

Some typical rating difficulties involve having:

- 1) Large numbers of similar sites where rating may be futile.
- 2) Many different people and interpretations of the ratings.
- 3) Skewed geographic distribution of visitors.
- 4) Tremendous ecological and physiographic variations.
- 5) Sites with historical significance
- 6) Liability concerns.

Consistency is important in the site rating. If possible, one person should rate all the sites. Alternatively, the average score of a panel should determine the site rating. As AML sites are remediated, the remaining ratings may become inappropriate. In this event, the score criteria may require revision and the remaining sites rated again. The ratings may also require revision with time as more information becomes available.

Under some circumstances, it may be appropriate to select sites differently than given by the rating procedure. For example, there could be insufficient funds to permanently close and remediate the highest priority site. In this case, a park might decide to simply fence the worst site and permanently close a less costly site with a lower priority. Justification for circumventing the site ratings include cost-benefit analysis, limited funds, less costly temporary closures versus more costly permanent closures, and concerns over liabilities.

If funds are to be sought from the Office of Surface Mining Reclamation and Enforcement (OSM), a park will have to convert their ratings to the hazard ranking system mandated by the Surface Mining Control and Reclamation Act (SMCRA) of 1977. The OSM ranking system is heavily weighted toward health and safety hazards, as follows:

- Priority 1: Previous injury or death, or property damage.
- Priority 2: Significant health and safety threats.
- Priority 3: Resource impacts.

For NPS purposes, the OSMRE ranking system does not adequately differentiate between sites.